

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civ. Action No. 2:21-cv-977
v.)	
)	Judge Marilyn J. Horan
PERRY HOMES, INC.,)	
ALLYSON WHITTINGTON, and)	Chief Magistrate Judge
ROBERT WHITTINGTON,)	Cynthia Reed Eddy
)	
Defendants.)	
_____)	

JOINT MOTION TO STAY

Plaintiff and Defendants, by their counsel, move for a stay of this action for thirty (30) days for the reasons stated herein.

1. On November 17, 2022, and November 18, 2022, the parties met with a private mediator in an attempt to resolve this action.

2. The parties made significant progress in achieving a settlement of this action, and need an additional thirty (30) days to continue their settlement discussions.

3. A stay of the action will conserve judicial resources, and will save the parties the time and costs of continued litigation.

WHEREFORE, the parties jointly seek a stay for thirty (30) days, and an extension of all deadlines in the Scheduling Order by thirty days as well. The parties attach a proposed order consistent with this motion.

Dated: November 22, 2022

Respectfully submitted,

CINDY K. CHUNG
United States Attorney
Western District of Pennsylvania

/s/ Jacqueline Brown
JACQUELINE C. BROWN
Assistant United States Attorney
Civil Division
Office of the U.S. Attorney
Western District of Pennsylvania
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
Tel: (412) 894-7565
Fax: (412) 644-6995
E-mail: jacqueline.c.brown@usdoj.gov
PA Bar No. 330010

/s/ Beth Pepper
SAMEENA SHINA MAJEED
Chief, Housing and Civil Enforcement Section
CATHERINE A. BENDOR
Special Litigation Counsel
BETH PEPPER
Trial Attorney
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
150 M Street, NE
Washington, DC 20002
Tel: (202) 305-0916
Fax: (202) 514-1116
E-mail: Beth.Pepper@usdoj.gov

*Attorneys for Plaintiff United States of
America*

/s/ Richard M. Hunt
Richard M. Hunt
Texas State Bar No. 10288700
rhunt@hunthuey.com
PRO HAC VICE

HUNT HUEY PLLC
3010 Mountain Ash Court
Garland, Texas 75044
Telephone: (214) 641-9182
Facsimile: (214) 279-6124

/s/ Jill D. Sinatra
Jennifer Gilliland Vanasdale
Pennsylvania Bar No. 87407
jennifer@gvlawoffice.com
Gary T. Vanasdale
Pennsylvania Bar No. 87802
gary@gvlawoffice.com

Gilliland Vanasdale Sinatra Law Office, LLC
257 South Main Street
Butler, PA 16001
724.741.0536 phone
724.741.0538 fax

Attorneys for Defendants